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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

6 In re: Case No. 08-25145

7 JOHN D. REYNEN and JUDITH M. REYNEN, Chapter 11

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9  
10 Debtors.

MLG-022

11 In re: Case No.: 08-34878

12  
13 CHRISTO BARDIS and SARA BARDIS, Chapter 11

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15  
16 Debtors.

MHK-009

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19  
**NOTICE OF PROPOSED MODIFICATIONS TO  
DEBTORS' FIRST AMENDED JOINT PLAN OF REORGANIZATION**

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1           **TO: THE UNITED STATES TRUSTEE, THE OFFICIAL COMMITTEE OF UNSECURED  
2 CREDITORS, ALL PARTIES WHO HAVE REQUESTED NOTICE PURSUANT TO  
3 BANKRUPTCY RULE 2002, AND ALL PARTIES WHO FILED OBJECTIONS TO THE  
DEBTORS' FIRST AMENDED JOINT PLAN OF REORGANIZATION (DATED MAY 29, 2009):**

4           **PLEASE TAKE NOTICE** that on May 28, 2009 a hearing was held before the Bankruptcy Court  
5 for the Eastern District of California (Sacramento Division), in the above-captioned chapter 11 cases to  
6 consider approval of the *Proposed Disclosure Statement for Debtors' First Amended Joint Plan of  
Reorganization (Dated May 29, 2009)* (the "Disclosure Statement") filed by the four debtors-in-possession in  
7 the above-referenced chapter 11 cases (collectively, the "Debtor Group") regarding the *Debtors' First  
Amended Joint Plan of Reorganization (Dated May 29, 2009)* (the "Joint Plan"). The Disclosure Statement  
8 was approved at the hearing, and confirmation procedures were established pursuant to this Court's *Order (I)  
Approving Disclosure Statement with Respect to Debtors' First Amended Joint Plan of Reorganization; (II)  
Approving Manner of Solicitation of Acceptances; and (III) Scheduling Confirmation Hearing* (the  
9 "Confirmation Procedures Order"), entered on June 3, 2009..

10           **PLEASE TAKE FURTHER NOTICE** that the Debtor Group intends to modify the Joint Plan, as  
11 shown on the blacklined copy of the *Debtors' Second Amended Joint Plan of Reorganization (Dated August  
1, 2009)* attached hereto as **Exhibit "A"**. The following summarizes the essential modifications contained in  
12 said exhibit, and interested parties are encouraged to review the exhibit for full details: (a) the treatment of  
13 Classes B1.8 (Wells-Wallace Secured Claim) and B1.11 (Wells-Reno Secured Claim) has been moved from  
14 Article V to Article IV, and treatment of those claims has been modified to render them unimpaired; (b) a  
15 separate class, Class B2.10, has been created for the alleged and disputed secured claim of Travelers  
16 Casualty and Surety Company of America ("Travelers"), wherein such claim, if and to the extent allowed,  
will be unimpaired; and (c) notice provisions have been added with respect to the status of the Travelers  
litigation, and any intended settlement thereof, related to its asserted lien against income tax refunds received  
by Christo and Sara Bardis.

17           **PLEASE ALSO TAKE FURTHER NOTICE** that pursuant to the Confirmation Procedures Order,  
18 on **JULY 29, 2009 AT 10:00 A.M.**, or as soon thereafter as counsel may be heard, the confirmation hearing  
19 on the Joint Plan, as modified, will be held before the Honorable Christopher M. Klein, United States  
20 Bankruptcy Judge, at the United States Bankruptcy Court for the Eastern District of California, Courtroom  
21 35, 6<sup>th</sup> Floor, 501 I Street, Sacramento, California 95814. Any remaining objections to the Joint Plan, as  
modified by the exhibit hereto, must be filed and served upon the Debtor Group's counsel of record no later  
than July 27, 2009. Interested parties are invited, but not required, to attend the hearing.

22           DATED: July 23, 2009

23           Submitted by:

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